

The Honorable Christopher M. Alston  
Chapter 7  
Hearing Date: November 3, 2017  
Hearing Time: 9:30 a.m.  
Hearing Location: 700 Stewart St, Seattle, WA  
7th Floor, Courtroom 7206  
Response Date: October 27, 2017

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re

BEN HOLMAN McINDOE,  
Debtor.

Case No. 15-17388-CMA

DECLARATION OF EDMUND J. WOOD  
IN SUPPORT OF TRUSTEE'S MOTION  
FOR CONTEMPT AND SANCTIONS

Edmund J. Wood, the chapter 7 trustee for Ben Holman McIndoe, declares and  
states as follows:

1. This case was commenced by the filing of a voluntary Chapter 11 petition  
by McIndoe on December 21, 2015 [Dkt. # 1]. On May 1, 2017, the case was converted to a  
proceeding under chapter 7 [Dkt. # 110]. On May 2, 2017, I was appointed as the chapter 7  
trustee [Dkt. # 112], and have acted in that capacity at all times since.

2. I make this declaration from my personal knowledge and the filings in this  
case, and in support of the Trustee's Motion for Contempt and Sanctions.

3. I did not receive \$39,713.99, or any part of it, from Richard L. Jones or  
Kovac & Jones, PLLC, on or before August 23, 2017, which was 21 days after entry of the Order  
for Disgorgement and Disallowance of Attorney's Fees of Special Counsel Richard L. Jones  
[Dkt. # 175].

4. As of October 4, 2017, I have not received the \$39,713.99, or any part of it, that was ordered disgorged by the Court.

I declare on penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

SIGNED this 4th day of October, 2017, at Seattle, Washington.

/s/ *Edmund J. Wood*

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Edmund J. Wood  
Chapter 7 Trustee